

Appl. No. 09/817,932  
Amdt. dated March 9, 2005  
Reply to Office Action of November 29, 2004

**REMARKS/ARGUMENTS**

Claim 1 - 23 are in the application for consideration. Reconsideration of the application is requested in view of the amendments made in the claims and the statements appearing below herein.

1. In accordance with the requirement made by the examiner the title of the application has been amended to be more clearly descriptive of the subject matter of the claims.

2. Claim 1 has been amended to require that the common boundary pixel boundary is selected using boundary selection criteria that are dependent on the positions of the first and second halftone pixel and independent of the intensity of the corresponding regions in the source image. Independent claims 19 and 20 have been amended to recite substantially the same limitations. In addition, certain of the claims which are dependent on claim 1 have been amended to be consistent with the changes made in the parent claim.

The amendments made in the claims are fully supported by the application as originally filed. The intensity-independent location of halftone dots is disclosed, for example, in Fig. 6F. See, for example, Fig. 6F and the text at page 32, line 21 to page 33, line 16.

Appl. No. 09/817,932  
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3. Claims 1 - 12 and 16 - 20 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 5,130.821 ("Ng"). In support of the rejection the examiner has asserted that Ng generally teaches a method for generating a halftone of a source image and that although the reference uses templates as opposed to glyphs, the templates serve as a functional equivalent and one of ordinary skill would be motivated to use either templates or glyphs in the digital halftoning method of Ng.

Applicants traverse this ground of rejection. As discussed above, Claim 1, has been amended to require that the common boundary pixel boundary is selected using boundary selection criteria that are dependent on the positions of the first and second halftone pixels and independent of the intensity of the corresponding regions in the source image. Ng does not teach this combination of limitations. Therefore, claim 1, as amended, is patentably distinguishable over Ng.

More specifically, even if it is assumed for the sake of argument that Ng's templates are equivalent to glyphs in claim 1 of the present application, the Office Action acknowledges that "...Ng's templates dictate the placement of halftone dots within a given area on the basis of density values of the source image)." In contrast, amended claim 1 recites that the halftone dots are located to abut a common pixel boundary that is selected independent of the intensity (density) of the corresponding region in the source image. The

Appl. No. 09/817,932  
Amdt. dated March 9, 2005  
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intensity-independent location of halftone dots is disclosed, for example, in FIG. 6F of the present application. More specifically, the halftone dot vectors 654a-i in FIG. 6F indicate the halftone pixel boundaries from which halftone dots 634a-i extend. The locations of the halftone dot vectors 654a-i are not dependent on the intensity of the corresponding regions (e.g., pixels) in the source image.

Claims 2-18 depend, either directly or indirectly, from claim 1 and therefore are patentably distinguishable over Ng for at least the same reason. Claims 19 and 20 have been amended to include substantially the same limitations as those described above with respect to claim 1, and therefore are also patentably distinguishable over Ng for at least the same reason.

4. Claims 13-15 have been objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 13-15 have been rewritten in this manner as newly-added claims 21-23 and are therefore allowable.

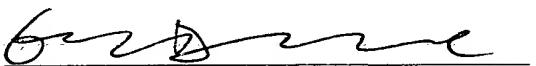
Reconsideration of this ground of rejection and withdrawal thereof are respectfully requested.

In summary, claims 1 - 23 are in the application for consideration. The claims have been shown to be

Appl. No. 09/817,932  
Amdt. dated March 9, 2005  
Reply to Office Action of November 29, 2004

directed to a wholly novel and patentable method for generating a halftone of a source image. Reconsideration of the application and allowance of the claims are respectfully requested.

Respectfully submitted,

  
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CERTIFICATE OF MAILING

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited with the United States Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Date: March 9, 2005

  
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